

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MASSACHUSETTS CARPENTERS CENTRAL COLLECTION )  
AGENCY,et al., )  
 )  
Plaintiffs, )  
 ) CIVIL ACTION  
v. ) NO. 04-10157-RCL  
 )  
SANAHAART INTERNATIONAL SALES CORP., )  
 )  
Defendant. )

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MOTION TO EXTEND TIME TO FILE MOTION FOR  
DEFAULT JUDGMENT

The Court issued a Notice of Default against defendant on September 16, 2004 in this action under ERISA for delinquent fringe benefit contributions. Plaintiffs have been assembling the data necessary to calculate the amount of damages, but require no more than an additional two weeks to prepare their affidavit of damages and submit their motion for entry of a default judgment.

WHEREFORE, plaintiffs respectfully request that their motion to extend their time to file a motion for a default judgment until October 29, 2004 be granted.

Dated: October 15, 2004

Respectfully submitted,

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Attorney for plaintiff Massachusetts

Carpenters Central Collection Agency